

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RUTH SCHWARTZ
Plaintiff,

V.

MARRIOTT INTERNATIONAL INC.
Defendant.

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

) CIV. ACTION # 05-CV-10433 RWZ

THE PARTIES' JOINT STATEMENT

Pursuant to United States District Court Local Rule 16.1 (D) the parties file the following Joint Statement.

I. JOINT PLAN FOR DISCOVERY AND THE FILING OF MOTIONS

1. The parties shall make their initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before May 15, 2005.
2. All fact discovery shall be completed by December 1, 2005.
3. The plaintiff shall identify his experts and produce expert reports pursuant to Fed. R. Civ. P. 26(a)(2) on or before December 15, 2005.
4. The defendant shall identify its experts and produce expert reports pursuant to Fed. R. Civ. P. 26(a)(2) on or before January 31, 2006.
5. All expert depositions shall be completed on or before February 15, 2006.
8. All dispositive motions, including motions for summary judgment pursuant to Mass. R. Civ. P. 56, shall be filed on or before February 28, 2006.
9. A final pretrial conference shall be scheduled by the Court sometime in March or April of 2006.

II. TRIAL BEFORE A MAGISTRATE

At this time the parties do not consent to trial before a magistrate.

III. CERTIFICATIONS

The parties have conferred with their clients as to establishing a budget or cost for the litigation and with respect to ADR programs. The parties will file their Rule 16.1 Certifications under separate cover.

RUTH SCWARTZ,
By her attorney,

RUBIN, WEISMAN, COLASANTI,
KAJKO & STEIN, LLP

/s/ David B. Stein
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MARRIOTT INTERNATIONAL, INC.
By its attorneys,

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